1   we'll mark as Exhibit 2.

2   (Exhibit No. 2 marked for

3   identification.)

4   Q   Let me know when you finish reading it and

5   then I'll ask you some questions.

6   A   Okay.

7   Q   Have you seen this document before?

8   A   I don't recall seeing it.

9   Q   Okay. Well, I'm going to call your attention

10 to the email on the top of Exhibit 2, which is from Dr.

11 Stadelmann to Dr. Linehan, and it states, I have now had

12 two students complain about the changes you made, and

13 Pat told me today that students have complained to her,

14 too. Who is Pat, if you know, that's referred to?

15   A   Pat Gajda.

16   Q   Okay. And what position does --

17   A   Pat is professor of history.

18   Q   Okay.

19   A   She is retiring on August 31st.

20   Q   As of March 25th, 2014, do you have any

21 recollection of talking with Dr. Stadelmann about the

22 complaints he received from students about Dr. Linehan?

23   A   I'm sure we did. I can't recall exact

24 instances.

25   Q   Okay.

1   Q   So is it your testimony that this was an

2   urgent situation?

3   A   Yes, seemed to me at the time it was.

4   Q   Did you talk to Dr. Linehan about what you had

5   learned in this meeting?

6   A   No.

7   Q   Why not?

8   A   I was -- at the time I believe there was a

9   reason. One, I wanted to work with the department chair

10   first. I thought Marcus would be the appropriate person

11   to talk with her.

12   Q   Did you direct Dr. Stadelmann to speak to

13   Dr. Linehan about what you had learned in this meeting?

14   A   I didn't have to. He was already in

15   communication with her.

16   Q   How did he communicate with her?

17   A   Well, through email mostly.

18   Q   Do you know if he ever sat down and talked

19   with her face-to-face?

20   A   I don't know. I don't know if he did or not.

21   She wasn't physically available that often.

22   Q   In your opinion, if you had called Dr. Linehan

23   back in March of 2014 and said, I need to meet with you,

24   you need to set up an appointment with my office, do you

25   have an opinion on whether she would obey that request?

1   Q   Okay. And if you look at the top portion of

2   this email, it's a response to Dr. Linehan from Dr.

3   Stadelmann, and it says, Mary, for the time being,

4   please do not do anything. If you lower her grade now,

5   it would look like you were punishing her for bringing

6   this to me attention and that will get the dean and

7   possibly the provost involved.

8   Did you ever see Dr. Stadelmann's response to

9   Dr. Linehan?

10   A   Not until this afternoon.

11   Q   And do you know if this is the electronic

12   communication that Dr. Stadelmann made to Dr. Linehan

13   after your meeting with the students following the

14   mid-term break?

15   MR. SOTO: Objection, form.

16   A   I don't, I don't know.

17   Q   (By Mr. O'Kelly) Did Dr. Stadelmann copy you

18   on any communication he had with Dr. Linehan about the

19   complaints from the students?

20   A   I don't recall that he did.

21   Q   Are you aware of what if any steps, other than

22   contacting Dr. Linehan, did Dr. Stadelmann take to

23   address the concerns raised by the students to you and

24   him?

25   A   I'm unaware.

1   Q   Okay. And who would have graded the students

2   for that course?

3   A   The course instructor.

4   Q   And that would have been Dr. Linehan?

5   A   Yes.

6   Q   Okay. Other than the reports that you

7   received in the -- after the mid-term break and

8   approximately a week later in this March of 2014, what

9   if any other reports did you receive from students about

10   Dr. Linehan?

11   A   I don't recall any.

12   Q   Do you recall having any further reports from

13   students after these two meetings?

14   A   Not from students.

15   Q   Okay. Did you receive reports from any

16   faculty members after these two meetings?

17   A   No.

18   Q   I'm sorry. When you said not from students, I

19   through there was somebody else that maybe --

20   A   Well, I -- I guess maybe I'm getting tired and

21   confused.

22   Q   That's okay.

23   A   But the report from HR is what I was thinking

24   about, but --

25   Q   Okay.

1   Q   Do you recall when an investigation was

2   commenced into Dr. Linehan?

3   MR. SOTO: Objection, form, vague.

4   Q   (By Mr. O'Kelly) Yeah, it is. You're right.

5   Let me try it again.

6   Who if anyone ordered an investigation into

7   Dr. Linehan's academic behavior?

8   A   I believe the charge was placed by the

9   provost.

10   Q   And who was the provost at that time?

11   A   Spring of 2014, it was -- it had to be Alissa

12   White, who was also getting ready to leave.

13   Q   Did you have any role in recommending that an

14   investigation be done into the allegations against

15   Dr. Linehan?

16   A   I assume so. I was certainly an advocate of

17   doing something.

18   Q   Do you recall what if anything you did to

19   assist in the initiation of an inquiry into Dr.

20   Linehan's alleged academic misconduct?

21   A   I believe I told the provost and perhaps

22   others that -- that we had several disconsolate students

23   and that we need to at least have some form of inquiry.

24   Q   Well, you were aware of disconsolate students

25   as far back as early -- or mid March of 2014; correct?

1   A   Probably late March.

2   Q   Okay.

3   A   I wasn't even here in the middle of March, so

4   I'm --

5   Q   Okay.

6   A   -- assuming it was late March.

7   Q   All right. Well, let's assume late March.

8   Certainly by the end of March you were aware of it.

9   A   Yes.

10   Q   Okay. And why wasn't an inquiry commenced

11 then?

12   A   Probably because we didn't get to it then.

13 The college has a lot of business to do, and this was

14 not the only priority we had.

15   Q   Okay. So this is something that had to be

16 done, but there were other things more important?

17   MR. SOTO: Objection.

18   Q   (By Mr. O'Kelly) You may answer.

19   A   Equally important.

20   Q   And just so that I'm clear, following -- let's

21 say -- let's say after the end of the spring semester,

22 would that have been like the end of May, 2014?

23   A   It probably would have been well before the

24 middle of May.

25   Q   Okay. What I'm trying to understand is what